



Timothy Elliott
Managing Director and Chief Regulatory Counsel
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VIA ELECTRONIC PORTAL

Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

**RE: Modifications to the International Cross-Asset Volume Incentive Program
COMEX Submission No. 25-041 (4 of 4)**

Dear Mr. Kirkpatrick:

Chicago Mercantile Exchange Inc. ("CME"), The Board of Trade of the City of Chicago, Inc. ("CBOT"), New York Mercantile Exchange, Inc. ("NYMEX"), and Commodity Exchange, Inc. ("COMEX") (collectively, the "Exchanges") hereby notify the Commodity Futures Trading Commission ("CFTC" or "Commission") of modifications to the International Cross-Asset Volume Incentive Program ("IVIP" or "Program"). The modifications to the Program will become effective on February 1, 2025.

Exhibit 1 sets forth the terms of the Program. Modifications appear below, with additions underlined and deletions ~~overstruck~~.

The Exchanges reviewed the designated contract market core principles ("Core Principles") as set forth in the Commodity Exchange Act ("CEA"). During the review, the Exchanges' staff identified the following Core Principles as potentially being impacted: Monitoring of Trading, Execution of Transactions, Protection of Market Participants, Compliance with Rules, Availability of General Information, and Recordkeeping.

The Program does not impact the Exchanges' ability to perform their trade practice and market surveillance obligations under the CEA. The Exchanges' market regulation staff will monitor trading in the Program's products to prevent manipulative trading and market abuse. The incentives in the Program do not impact the Exchanges' order execution. Participants in the Program will be selected by the Exchanges' staff using criteria as further stated in Exhibit 1. Chapter 4 of the Exchanges' rules includes prohibitions against fraudulent, non-competitive, unfair or abusive practices. The Program is subject to these rules. The Program is subject to the Exchanges' record retention policies which comply with the CEA.

CME, CBOT, NYMEX, and COMEX certify that the Program complies with the CEA and the regulations thereunder. There were no substantive opposing views to this Program.

The Exchanges certify that this submission has been concurrently posted on the Exchanges' website at <http://www.cmegroup.com/market-regulation/rule-filings.html>.

If you require any additional information regarding this submission, please e-mail CMEGSubmissionInquiry@cmegroup.com or contact Rachel Johnson at 312-466-4393 or via e-mail at Rachel.Johnson@cmegroup.com.

Sincerely,

/s/ Timothy Elliott
Managing Director and Chief Regulatory Counsel

Attachment: Exhibit 1

EXHIBIT 1

INTERNATIONAL CROSS-ASSET VOLUME INCENTIVE PROGRAM

Program Purpose

The purpose of this Program is to incentivize high volume proprietary trading arcades located outside North America to trade the products listed below. The resulting increase in liquidity in the products listed below benefits all participant segments in the market.

Product Scope

Certain CME, CBOT, NYMEX, and COMEX products that are available for trading on the CME Globex Platform; all CME Interest Rate options available for trading via open outcry (collectively, the "Products").

Eligible Participants

There is no limit to the number of participants that may participate in the Program. Participants must be distinct legal entities located outside of North America.

Additional Arcade Firm Requirements:

- Teams of individuals with joint profits and losses under a participating arcade firm must be registered and approved by the Exchanges to be eligible for discounted rates under the arcade firm. Teams that adjust their legal status for the purpose of achieving lower combined rates may not be accepted into the Program. If firms have affiliates based in North America, they must apply for an exception.
- Individual traders under the participating arcade firm must be receiving less than eighty percent (80%) of profits and losses* and:
 - Have primary income coming from trading;
 - Pay a desk fee;
 - Primarily trade from the physical location operated by the participating arcade firm;
 - Share risk with the participating arcade firm; and
 - Be available to receive product notices and education.

*Participants previously enrolled in the Program may receive up to ninety percent (90%) of profits and losses.

Program Term

Start date is November 1, 2012. End date is ~~January 31, 2025~~ January 31, 2026, or the date on which the Exchanges determine to modify, extend, or terminate the Program. Participants will be given notice of any changes to the Program Term.

Hours

The incentives will apply to all trades made in the Products regardless of the execution time.

Obligations

For continued eligibility and incentive qualification, participants must maintain a combined average daily volume (“ADV”) in the Products of 5,000 contracts (sides) measured over a given calendar quarter. Micro E-mini Equity Index products will be excluded from this ADV requirement.

Incentives

Fee Discounts: Upon meeting all obligations, as determined by the Exchanges, participants will receive the following incentives:

Product Category	IVIP All-in Fees (Per Side)
CME Globex Only	
CME Products	
Agricultural – Futures ¹	\$0.89
Agricultural – Options ¹	\$0.89
Lumber Futures	\$0.82
Full Size Foreign Exchange – Futures (excluding FX Link)	\$0.54
Full Size Foreign Exchange – Futures via FX Link	\$0.60
Foreign Exchange – Options	\$0.54
E-mini Foreign Exchange Contracts	\$0.54
E-micro Foreign Exchange Contracts	\$0.15
Full Size Equity Index – Futures	\$1.10
E-mini Equity Index – Futures (Outrights & Spreads excluding Dividend Index Futures)	\$0.75
E-mini Equity Index – Options	\$0.50
Case Schiller Housing Index – Futures (Outrights & Spreads)	\$0.75
Micro E-Mini Equity Index – Futures	\$0.18
Micro E-mini Equity Index – Options (Outrights & Spreads)	\$0.10
Nikkei/TOPIX Futures (Outrights & Spreads)	\$1.10
Interest Rate Futures (Front Months, Back Months, & Bundles)	\$0.50
Interest Rate Futures (Cross-Currency Basis)	\$0.80
Interest Rate Options	\$0.50
CBOT Products	
Full Size Agricultural Futures Contracts ¹	\$1.11
Full Size Agricultural Options	\$1.11
Mini Agricultural Contracts	\$0.90
ICS & CS Agricultural Options	\$2.06
E-mini Dow/DJ U.S. Real Estate	\$0.75
Micro E-Mini Dow Futures	\$0.18
Eris Swap Futures	\$0.50
Micro Treasury Yield Futures	\$0.21
TBA Futures	\$0.50
U.S. Treasury Futures	\$0.54
U.S. Treasury Options	\$0.54
Fed Fund Products	\$0.49
MAC Swap Futures	\$0.49

Product Category	IVIP All-in Fees (Per Side)
CME Globex Only	
NYMEX Products	
Henry Hub Natural Gas Look-Alike Last Day Financial Futures (HH) ¹	\$0.90
Henry Hub Natural Gas Look-Alike Options (LN)	\$0.90
Henry Hub Natural Gas Futures (NG) ¹	\$0.90
Henry Hub Natural Gas Options (ON)	\$0.90
Light Sweet Crude Oil (WTI) Futures (CL) ¹	\$0.90
Light Sweet Crude Oil Options (LO)	\$0.90
NY Harbor ULSD Futures (HO) ¹	\$0.90
RBOB Gasoline Futures (RB) ¹	\$0.90
Natural Gas Weekly Financial Option (LN1 - LN5)	\$0.95
Crude Oil Friday Weekly Option (LO1 - LO5)	\$0.95
Crude Oil Monday Weekly Option (ML1 - ML5)	\$0.95
Crude Oil Wednesday Weekly Option (WL1 - WL5)	\$0.95
E-mini Crude Oil Futures (QM)	\$0.88
E-mini Natural Gas Futures (QG)	\$0.45
NYMEX Metals (PL, PA) ¹	\$1.00
COMEX Products – Futures Only	
Core Metal (GC, SI, HG) ¹	\$1.00
E-micro Gold (MGC) [±]	\$0.20
1,000-oz. Silver (SIL)	\$0.40
Shanghai Gold (SGC, SGU)	\$1.00
Gold (Enhanced Delivery) Futures (4GC)	\$1.00

Product Category	IVIP All-in Fees (Per side)
Pit Trading	
CME Products	
Interest Rate Options	\$0.50

¹For the products denoted with a ¹ above, Globex TAS transactions will be excluded from the Program.

Monitoring and Termination of Status

The Exchanges shall monitor trading activity and participants' performance and shall retain the right to revoke participant status if it concludes from review that a participant no longer meets the eligibility requirements or fails to meet the obligations of the Program.

If a participant does not meet the minimum volume requirements during any one (1) calendar quarter of the Program, the participant will still be eligible to receive the incentives for that applicable quarter. In order to continue to receive the incentives, participants must meet the minimum volume requirements for all subsequent calendar quarters.